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*Attorneys for Defendant CDK Global, LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TEKION CORP., a Delaware corporation

Plaintiff,

VS.

CDK GLOBAL, LLC, a Delaware limited  
liability company

**Defendant.**

Case No. 3:24-cv-08879-JSC

**DECLARATION OF VINEET BHATIA  
IN SUPPORT OF DEFENDANT CDK  
GLOBAL, LLC'S MOTION TO  
DISMISS**

Date April 24, 2025  
TIME: 10:00 a.m.  
PLACE: San Francisco Courthouse,  
Courtroom 8 – 19th Floor  
450 Golden Gate Avenue, San  
Francisco, CA 94102

1 I, Vineet Bhatia, declare as follows:

2 1. I am a partner with the law firm of Susman Godfrey L.L.P., which represents CDK  
3 Global, LLC (“CDK”) in this matter. I am admitted to practice *pro hac vice* in this matter. I make  
4 this declaration in support of CDK’s Motion to Dismiss. I have personal, first-hand knowledge of  
5 the matters below and, if called to testify as a witness, I could and would testify competently to  
6 them.

7 2. Attached as **Exhibit 1** is a true and correct copy of the print article “Tekion’s sights  
8 set on growth milestones,” authored by Mark Hollmer and published in *Automotive News* on  
9 April 15, 2024.

10 3. Attached as **Exhibit 2** is a true and correct excerpt of Plaintiff Tekion Corp.’s U.S.  
11 Master Subscription Agreement (“MSA”), effective September 26, 2024, which is available online  
12 from Tekion’s website, <https://tekion.com/legal/agreements/us-arc-msa>.

13 4. Attached as **Exhibit 3** is a true and correct copy of the transcript of Asbury  
14 Automotive Group, Inc.’s January 30, 2025, Q4 2024 Earnings Call, which is available online at  
15 [https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-](https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-call-transcript)  
16 [call-transcript](https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-call-transcript).

17 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
18 and correct.

19 Executed this 10th day of February, 2025 at Houston, Texas.

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21 /s/ *Vineet Bhatia* \_\_\_\_\_

22 Vineet Bhatia  
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